



# PINEWOOD

## Slavery and Human Trafficking Statement

Picture Holdco Limited and Pinewood Group Limited ("**Pinewood**") and their affiliates and subsidiaries listed in Appendix 1 to this Statement (together, the "**Group**") are committed to the prevention, deterrence and detection of slavery and human trafficking.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 on behalf of the Group and sets out the steps taken to achieve Pinewood's stance of zero-tolerance of all forms of slavery, human trafficking and other exploitation in Pinewood's supply chain or in any part of Pinewood's business for the financial year ending 31 March 2019.

### **Our business**

Pinewood is one of the leading providers of studio and related services to the worldwide film and television industries. Synonymous with world class British and international productions, our studios have an impressive heritage and have been home to some of the most successful feature films and TV shows ever made. Pinewood Studios and Shepperton Studios have been home to over 2,000 films in more than 80 years and have hosted over 800 TV shows.

Pinewood's international network of studios and operations include Canada, the Dominican Republic, the USA, and activities in Ireland.

### **Pinewood Supply Chain and Suppliers**

With over 80 years of experience, Pinewood's supply chain and its relationship with its suppliers has been established and improved. The film and television production business traditionally has a close, personal relationship based upon knowledge and experience, with broad types of services and goods supplied by a large pool of suppliers both locally-sourced and from around the globe.

As the Group has expanded it has increased its due diligence and KYC; a formal New Supplier Process (defined below) has been introduced and improved with the intention to achieve a transparent supply chain in compliance with relevant laws. These on-boarding processes include bank verification, anti-bribery statements, slavery and human trafficking statements, health and safety checks, insurance checks and credit checks to ensure that we know who we are working with and to ensure they are the best suppliers for the service being provided ("**New Supplier Process**").

Responsibility for managing supply chains sits with all employees utilising the New Supplier Process, overseen by the Procurement and Legal departments.

### **Slavery and Human Trafficking Policy and related policies**

The Pinewood Group Board takes a zero-tolerance approach to slavery and human trafficking. The Board approved Pinewood's first Slavery and Human Trafficking Policy ("**Policy**") in September 2017 and approved further updates in March 2018 and July 2019. The current version of the Policy is publicly available to all staff, customers, suppliers and members of the public and is available at [www.pinewoodgroup.com](http://www.pinewoodgroup.com).

The Policy regularly reviewed and, if required, updated (at least annually) by the relevant stakeholder/department.

The New Supplier Process includes mandatory questions on slavery and human-trafficking, which must be completed for any new supplier to be added to Pinewood's supply chain. Existing suppliers are required to complete the questionnaire as part of a 'Supplier Information Update Process'.

Pinewood requires that its suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. Pinewood's standard terms have been updated to require absolute compliance with the Modern Slavery Act as a condition of contract. In the event of any breach of slavery and human trafficking laws or breach of the Policy, Pinewood may in its sole discretion terminate suppliers' contracts.

All suppliers and contractors are further required to comply with Pinewood's Contractors Code of Conduct, which concerns and governs the business relationship with our suppliers and contractors. This contains reference to Pinewood's Slavery and Human Trafficking Policy.

Pinewood provides relevant staff with training on the scope and application of the Policy at appropriate intervals and regular reminders are published. All Pinewood employees and suppliers should know how to identify or prevent slavery and human trafficking.

### **Film & Television Industry – Principal Risks**

Key "risk areas" particular to the film and television industry in relation to slavery and human trafficking arise in the use of freelancers, contracts and businesses across international borders and the sub-contracting of responsibilities in the Pinewood supply chain. The movement of people internationally within the film production industry is common. This can include travel to filming locations around the world including perceived "high risk" areas for slavery and human trafficking. This raises the risk level. Outsourcing and complicated supply chains also are relevant to the risk level, especially in relation to difficulties of performing due diligence across-borders.

Pinewood uses its New Supplier Process, as well as contractual documentation to minimise the risks within its supply chain.

Risk assessments are undertaken by the Legal and Procurement departments relating to areas of the business and activities that could have the potential to present a greater level of risk for slavery and human trafficking. Risk assessments cover the following key factors: territory, sector, business type, transactions, outsourcing, department, level of spend, individuals involved, and agencies/partnership relationships.

### **Performance Indicators**

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Numbers of new suppliers added to the supply chain yearly;
- Incidents and reports from employees or other individuals of non-compliance;
- Suppliers terminated for breach of the Policy;
- Number of potential suppliers with poor or non-existent slavery and human trafficking policies or a reluctance to co-operate with the New Supplier Process;
- Number of potential suppliers refusing to accept slavery and human trafficking language or attempts to substantially modify the language included in their contractual terms;
- Number of suppliers in compliance
- Periodic review of contractual language and know-how as necessary; and
- Numbers of Pinewood staff trained on the Policy.

## 2019 Updates

Key updates in the last financial year have been:

- New training documents created for staff and updated training rolled out July 2019 for key stakeholders including Finance, Procurement and Operations staff. Sessions on the updated training were completed in July and August 2019 for key stakeholders in the Finance, Procurement, Operations, HR and the Communications & Marketing teams. Copies of the new training pack are available to all staff;
- Joining as a member of the TISCreport (<https://tiscreport.org/>) and reviewing suppliers in compliance via the portal;
- Continuing to add contractual protections and provisions on anti-slavery and human trafficking in all new contracts and standard terms;
- Risk-focused procurement process, amending/updating questions on the New Supplier onboarding process and all tenders, and requiring suppliers to provide suitable evidence and warranties on compliance;
- Refocus of international strategy has seen two developments:
  - As of 11<sup>th</sup> July 2019, the Group's collaboration with Iskandar Malaysia Studios ended by mutual agreement.
  - On 5<sup>th</sup> August 2019, the Group announced it sold its equity in Pinewood Atlanta Studios to its joint venture partner in Atlanta. The Group will provide sales and marketing support for the Studios in Atlanta for a period of up to 18 months from 5<sup>th</sup> August 2019.
- Ongoing communication and review. The Group took a risk-based approach to evaluate its supply chain and to contact the Group's key suppliers with specific and bespoke reminders of their obligations under the Act.

## Future Plans

For the next financial year, the Group plans to focus on:

- Further analysis of the Group's supply chain in tandem with a procurement initiative to rationalise and reduce the number of suppliers;
- Continuing to improve and enhance Group policies and procedures in respect of human rights and modern slavery risks; and
- Roll out training to the wider business and to key suppliers.

## Board Approval

The Group Board approved this Statement on 23 September 2019 and authorised Paul Golding to sign accordingly.

Signed: .....



**Paul Golding**  
**Chairman and Acting Chief Executive Officer**  
**Pinewood Group Limited**

Date: .....

23 September 2019

## Pinewood Studios Group – Relevant Entities

### *England and Wales Incorporated Entities*

Company	Company No.
Picture Holdco Limited	10296277
Pinewood Group Limited	03889552
Pinewood Studios Limited	0392619
Shepperton Studios Limited	02974333
Pinewood Finco plc	11054849
Pinewood-Shepperton Studios Limited	02985190
Pinewood Shepperton Facilities Limited	07527390
Pinewood Films Limited	07660856
Pinewood Camera Trap Limited	8153323
Pinewood Riot Club Limited	8446929
Pinewood Films No.11 Limited	08865342
Pinewood Films No.12 Limited	08865668
Pinewood Films No.13 Limited	9006529
Pinewood Films No.14 Limited	9176261
Where Hands Touch (FPC) Limited	9443603
Pinewood Media Development Limited	09592018
Pinewood Film Advisors Limited	8164867
Pinewood Film Advisors (W) Limited	08864165
PSL Consulting Limited	8655214
Pinewood Studio Wales Limited	08863162
Pinewood Dominican Republic Limited	07096246
Pinewood Malaysia Limited	07074446
Pinewood Germany Limited	07079399
Pinewood PSB Limited	06300755
Shepperton Management Limited	05907027
Shepperton Studios (General Partner) Limited	05913009
Pinewood Shepperton Limited	09083961
Shepperton Studios Property Partnership	LP11523
Baltray No. 1 Limited	05776674
Baltray No. 2 Limited	05778635

### *International Incorporated Entities*

Company	Company No.
Pinewood Productions Ireland Limited (ROI incorporated)	479869
Space Bear IR Designated Activity Company (ROI incorporated)	565529
Pinewood Film Services GmbH (Hamburg incorporated)	n/a
Pinewood Film Production Studios Canada Inc. (British Columbia incorporated)	BC0892587
Pinewood Production Services Canada Inc.	885239-1

(Ontario incorporated)  
Pinewood USA Inc. (California incorporated)

n/a